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May 9, 2025

VIA ECF

The Honorable George B. Daniels
Daniel P. Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

The Honorable Sarah Netburn
Thurgood Marshall U.S. Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels, Dear Judge Netburn:

I write to advise the Court of a supplemental production received from the United Kingdom's Metropolitan Police Service ("MPS") pursuant to this Court's June 9, 2021 Request to the United Kingdom for International Judicial Assistance pursuant to the Hague Convention of 18 March 1970 on Taking of Evidence Abroad in Civil or Commercial Matters ("Hague Convention Request") (ECF 6384-1, 6858).

At today's date, May 9, 2025, pursuant to the terms of the Hague Convention Request, a complete set of copies of the MPS materials received (the "MPS 2025 Production") has been filed under seal, per the MDL Protective Order, ECF 1900, with the U.S. District Court for the Southern District of New York. The filing consists of one (1) 1TB USB hard drive that is an exact copy of the hard drive the MPS produced, as well as one (1) DVD containing the materials the MPS provided in the form of data saved on CD-ROMs / DVDs and via secure file transfer.

Plaintiffs will provide defense counsel with a complete set of copies of the MPS 2025 Production as quickly as possible. Plaintiffs are also providing a courtesy copy of the complete MPS 2025 Production to the Department of Justice.

The Hague Convention Request sought to obtain copies of "evidential holdings (historical)" from the MPS related to Saudi government employee Omar al-Bayoumi, for purposes of the litigation against the Kingdom of Saudi Arabia pending before the United States District Court for the Southern District of New York (03-MDL-1570).

The MPS has approached its compliance with the Order and its duty to produce materials responsive to the Hague Convention Request as ongoing commitments, such that the MPS has periodically undertaken "further review and due diligence processes to identify additional exhibits and documents," and has produced responsive material in tranches. *See* Exhibit A to the Declaration of J. Gavin Simpson, Esq (sworn statement of MPS Detective Superintendent David McGillicuddy).

The MPS has again identified additional responsive material, *id.*, and has today provided a third tranche of production. The materials in the MPS 2025 Production were handed over to counsel for the *Ashton* Plaintiffs pursuant to the terms of the Hague Convention Request, with the handover completed at today's date, May 9, 2025. *See* Simpson Decl.

May 9, 2025

The Honorable George B. Daniels

The Honorable Sarah Netburn

Respectfully Submitted,

KREINDLER & KREINDLER

/s/ J. Gavin Simpson, Esq.

James Gavin Simpson, Esq

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cc: Assistant United States Attorneys Sarah Normand and Jennifer Jude
(via Overnight Mail)
All counsel of record (via ECF/CM)